

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Douglas W. Domenech

Secretary of Natural Resources

May 9, 2013

Wm Byron Penland LTC. Commander, U.S. Army Radford Army Ammunition Plant P.O. Box 2 Radford, VA 24143-0002

Todd D. Hayes
Director, Facility Support Services
BAE Systems Ordnance Systems Inc.
P.O. Box 1
Radford, VA 24143-0001

Location: Montgomery County Registration No.: 20656 AFS ID: 51-121-00006

Dear Messrs, Penland and Hayes:

Attached is an administrative amendment to your Title V permit to operate your facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. <u>Please read all conditions carefully.</u>

This approval to operate does not relieve the Radford Army Ammunition Plant of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The <u>Regulations</u>, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Messrs. Penland and Hayes May 9, 2013 Page 2

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director Department of Environmental Quality P. O. Box 1105 Richmond, VA 23218

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please contact Patrick Corbett at (434)582-6230.

Sincerely,

Robert J. Weld Regional Director

Attachment: Permit

cc:

Director, OAPP (electronic file submission)

Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III

Manager/Inspector, Air Compliance

Douglas W. Domenech

Secretary of Natural Resources

Lynchburg, Virginia 24502

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Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:

BAE Systems Ordnance Systems,

Registration:

20656

Facility Name:

Radford Army Ammunition Plant

AIRS Number:

51-121-0006

Permit Number:

VA-20656

Facility Location:

Off State Route 114, near

Radford, Montgomery County, Virginia

Inc.and US Army

January 15, 2004 Effective Date

May 9, 2013

Administrative Amendment Date

January 15, 2009 **Expiration Date**

> Robert J. Weld Regional Director

5/9/2013

Signature Date

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I. Facility Information

Permittees

BAE Systems Ordnance Systems, Inc. P. O. Box 1 Radford, VA 24143-0002

US Army P. O. Box 2 Radford, VA 24143-0001

Facility

Radford Army Ammunition Plant Off State Route 114, near Radford Montgomery County, Virginia Responsible Officials

Todd D. Hayes Director, Facility Support Services

LTC Wm Byron Penland Commanding Officer

Contact Person

Jay Stewart Environmental Manager (540) 639-7785

Registration Number: 20656

AFS Identification Number: 51-121-0006

Facility Description: SIC Codes 2892, 2869 – The Radford Army Ammunition Plant (RFAAP) is a United States Department of Defense facility operated by BAE Systems Ordnance Systems, Inc. (BAE). The facility, which has been in existence since the Second World War, manufactures specialty munitions, propellants and chemicals for the United States Army and other users. The facility currently consists of the following areas: coal- and fuel oil-fired boilers and other fuel burning equipment; a nitric acid production plant; nitrocellulose production; nitroglycerin production; single- and multi-base propellant production by batch process; DNT and TNT production; chemical weighing and grinding areas; and miscellaneous operations, including a dedicated wastewater treatment facility, degreasers, gasoline storage tanks and maintenance equipment and operations.

The plant is by definition a Title V major source due to potential emissions of criteria pollutants PM-10, sulfur dioxide, nitrogen oxides, volatile organic compounds, lead and carbon monoxide in excess of 100 tpy; potential emissions of hydrogen chloride, hydrogen fluoride, ethylene glycol, toluene, methylene chloride, dibutyl phthalate and 2,4-dinitrotoluene in excess of 10 tpy; and potential emissions of total HAPs in excess of 25 tpy. It is located in an attainment area for criteria pollutants, and is a PSD major source. The boilers all predate NSPS Subpart Db and Dc applicability, and none of the tanks are subject to NSPS Subparts K or Ka. The air curtain destructor will be subject to either the federal (NSPS Subpart DDDD) or state requirements for Commercial and Industrial Solid Waste Incinerators, depending upon the dates of (1) promulgation of the federal plan and (2) EPA approval of Virginia's plan. The DNT process is subject to all three subparts of the Hazardous Organic NESHAP (HON) standards and the two waste propellant incinerators are subject to the Hazardous Waste Combustion NESHAP standards. An alternative operating scenario has been requested to provide for the manufacture of TNT (not currently in production) or DNT in both production areas.

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II. Emission Units

Equipment to be operated consists of:

Applicable Permit Date		a	r			3. ***			•	
Pollutant Controlled		Particulate	Particulate	Particulate	Particulate	Particulate	Particulate	Particulate	,	
PCD ID		PHC1	PHC2	PHC3	PHC4	PHC5	PHC6	PHC7		
Pollution Control Device (PCD) Description		Electrostatic precipitator (ESP) controls boiler emissions	Baghouse	Ash conditioning	•	•				
Size/Rated Capacity		210 x 10 ⁶ BTU/hr	210 x 10 ⁶ BTU/hr	210 x 10° BTU/hr	210 x 10 ⁶ BTU/hr	210 x 10 ⁶ BTU/hr			0.35 x 10° BTU/hr	0.35 x 10° BTU/hr
Emission Unit Description		Power House Boiler 1: coal/#2 fuel oil-fired boiler	Power House Boiler 2: coal/#2 fuel oil-fired boiler	Power House Boiler 3: coal/#2 fuel oil-fired boiler	Power House Boiler 4: coal/#2 fuel oil-fired boiler	Power House Boiler 5: coal/#2 fuel oil-fired boiler	Ash silo	Ash truck loading	Waste Oil Boiler 1	Waste Oil Boiler 2
Stack ID	Fuel Burning Equipment	PHS1	PHS1	PHS1	PHS1	PHS1	PHS6 A-B		WBS1	WBS2
Emission Unit ID	Fuel Burnin	PHI	PH2	PH3	PH4	PHS	PH6	PH7	WBI	WB2

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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Process NA:	: Nitric Acid Plant	Plant					
NAE01 A-B	NAS1 A-D	Two (2) ammonia oxidation (single stage) units with bubble cap tray absorption	Total plant: 50 tons/day nitric acid output each (100 tpd combined)	Extended absorption (tray-type absorber) with mist eliminator	NACI A-B	NOx	
Process NC:		Nitrocellulose Production					
NCE01 A-B		Two (2) cotton bale breakers/building, 2 buildings	Total plant: 150.5 tons/day nitrocellulose output			PM	1
NCE02 A-B		Two (2) dryers/building, 2 buildings	See above			PM	
NCE03 A-B	NCS3 B	Two (2) airveys/building, 2 buildings	See above	Cyclone/dust collector	NCC3B	PM	÷
NCE04 A-B		Wood pulp shredding – 2/building, 2 buildings	See above			PM	
				Wet (horizontal piccolo) scrubber	NCC5B2	NOx, SO ₂	A & B lines:
NCE05 A-B	NCS5A, B1-2	Two (2) continuous nitrators – 2/building, 2 buildings	See above	Wet (tray) scrubber, followed by selective catalytic reduction (SCR) unit - US Army Corps of Engineers design	NCC5A, 5B1	NOx, SO ₂	6/28/88; C line: 9/10/03 (superseded 12/5/97 and 3/9/93 permits)
NCE06 A-B		Acid screen house - 2 buildings	See above	Same as NCE05A-B	Same as NCE05 A-B	Same as NCE05A-B	
NCE07 A-B		Boiling house (60 tubs) – 2 buildings	See above			NOx, SO ₂	
NCE08 A-B		Jordan beaters – 2 buildings	See above			NOx, SO ₂	

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PCD ID Pollutant Applicable Permit Controlled Date					NGC1 NOx	NGC1 NOx	NGC1 NOx					SBC1 VOCs		SBC1 VOCs A-C.	SBC1 VOCs	SBC1 VOCs	SBC6 VOCs	(frace
Pollution Control Device (PCD) Description					Wet scrubber	Wet scrubber	Wet scrubber					Activated carbon vapor recovery		Activated carbon vapor recovery	Activated carbon vapor recovery	Activated carbon vapor recovery	Condensers	
Size/Rated Capacity	See above	See above	See above		Total plant: 5000 lbs/hr nitrate esters output	See above	See above	See above	See above	See above		Total plant: 155 tons/day singlebase output	See above	See above	See above	See above	See above	
Emission Unit Description	Poacher house (36 tubs) – 2 buildings	56 blender tubs – 2 buildings	16 nitrocellulose wringers – 4 buildings	Processes NG-1 and NG-2: Nitrate Esters	Nitrator	Acid separator	Soda water separator	Distribution/receiver house	NG/solvent mixhouse	Slurry mixhouse	Single-Base Propellant Production	Deby press building	Temporary storage house	Mix house	Blocker house	Extruder press/cutting house	Solvent recovery house	
Stack ID				G-1 and NG-	NGS1 A-B	NGS1 A-B	NGS1 A-B					1		See SBE01	See SBE01	See SBE01	SBS6 A-V	
Emission Unit ID	NCE09 A-B	NCE10 A-B	NCE11 A-D	Processes N	NGE01 A-B	NGE02 A-B	NGE03 A-B	NGE04	NGE05	NGE06	Process SB:	SBE01 A-C	SBE02 A-D	SBE03	SBE04 A-D	SBE05 A-C	SBE06 A-V	CDE07

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			war		-			-										-	
Applicable Permit Date																			
Pollutant Controiled	(trace VOCs)	PM		PM	PM		PM	PM	PM		PM							PM	PM
PCD ID		SBC9 A		SBC11 A-C	SBC12		SBC14 A	SBC15	SBC16 A-B		MBC1							MBC8	MBC9
Pollution Control Device (PCD) Description		Wet scrubber		Wet scrubber	Wet scrubber		Wet scrubber	Wet scrubber	Wet scrubber		Venturi scrubber							Wet scrubber	Wet scrubber
Size/Rated Capacity	See above	See above	See above	See above	See above	See above	See above	See above	See above		Total plant: 40 tons/day multibase output	See above	See above	See above	See above	See above	See above	See above	See above
Emission Unit Description	Air dry	Glazing	Coating	Screen/blend/packout	Glaze/blend/screen/packout	Screen/sort	Screen	Dumping	Pack out (propellant packaging)	Process MB: Multi-Base Propellant Production	Nitrocellulose block breaker	Pre-mix mixer	Nitrocellulose/nitroglycerin charge mixer	Propellant block press	Propellant extrusion	Propellant cutters	Forced air dryers	Glazing	Screen/packing
Stack ID		SBS9 A-B		SBS11 A-C	SBS12		SBS14 A	SBS15	SBS16 A-B	: Multi-Base	MBS1	MBS2 A-B	MBS3 A-G	MBS4 A-I	MBS5 A-H	MBS6 A-H	MBS7 A-U	MBS8	MBS9
Emission Unit ID	SBE08 A-J	SBE09 A-B	SBE10 A-B	SBE11 A-D	SBE12	SBE13	SBE14 A-B	SBE15	SBE16 A-C	Process MB	MBE01	MBE02 A-B	MBE03 A-G	MBE04 A-I	MBE05 A-H	MBE06 A-H	MBE07 A-U	MBE08	MBE09

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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
MBE10	MBS10	Dumping	See above	Wet scrubber	MBC10	PM	
MBEII		Block breaker rest house					
Process TN:	: TNT Production	ction					
TNE01 A-B		Nitration/dynamic separation and acid washing	Total plant: 100 tons/day TNT output (2 lines @ 50 tons/line)	Absorption	TNC1 A-B	NOx	
TNE02 A-B	TNS2 A-B	Chemical washing	See above	Venturi scrubber	TNC2 A-B	NOx	
TNE03	TNS2 A-B	Hot water wash	See above	Venturi scrubber	TNC2 A-B	NOx	
TNE04	TNS4	Spent acid recovery (SAR)	See above	Absorption	TNC4	NOx, SO ₂	
TNE05	TNS5 A-C	TNT/water separation	See above	Wet scrubber	TNC5 A-C	VOCs	
TNE06	TNS5 A-C	Drying	See above	Wet scrubber	TNC5 A-C	vocs	
TNE07	TNS7 A-C	TNT flaker drum	See above	Venturi scrubber	TNC7 A-C	PM	
TNE08	TNS7 A-C	TNT packout		Venturi scrubber	TNC7 A-C	PM	
TNE09		TNT wastewater pretreatment (dumping of bagged chemicals)		Cyclone separator	TNC9	PM	
Process DN:	N: DNT Production	uction					
DNE01 A1-2, B1-2	TNSI A-B	Four (4) nitrator/dynamic separator stages and two (2) acid washers	Total plant: 150 tons/day DNT output (4 lines @ 37.5 tons/line)	Absorption	TNC1 A-B	NOx	4
DNE02 A-R	TNS2 A-B	Chemical washing	See above	Venturi scrubber	TNC2 A-B	NOx	
DNE03	TNS2 A-B	Hot water wash (2)	See above	Venturi scrubber	TNC2 A-B	NOx	
DNE04	TNS4	Spent acid recovery (SAR)	See above	Absorption	TINC4	NOx, SO ₂	
DNE05		DNT/water separation	See above			DNT fumes	

Radford Army Ammunition Plant Permit Number: VA-20656 December 1, 2003 as amended May 9, 2013

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) N)		

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Process CW	V: Chemical V	Process CW: Chemical Weighing and Grinding					
CWE01	CWS1	Two (2) weigh stations (Chemical Grind House Bldg. 3524)	Total plant: 100 tons/month miscellaneous dry ingredients output	Baghouse	CWC01	PM, Pb	
CWE02	CWS1	Two (2) electronic mechanical grinders (Chemical Grind House Bldg. 3524)	See above	Baghouse	CWC02	PM	
CWE03	CWS3	Chlorate blending and grinding (Chlorate Grind House)	See above	Vent filter	CWC03	PM	
CWE04	CWS4	DNT grinder and batch drop (DNT Screen House)	See above	Vent filter	CWC04	PM (DNT)	
CWE05	CWSS	Two (2) weigh stations (Chemical Grind House Bldg. 3524-A)	See above	Wet collector	CWC02		
CWE06		Caustic cleaning				VOC	
Process MI.	SC-1: Degrea	Process MISC-1: Degreasing Operations					
MSIEI		Degreasing metal parts, etc.	450 gal total volume				
Process MI	SC-2: Paintin	Process MISC-2: Painting and Surface Coating					
MS2E1	h	Misc. painting and surface coating	58 gal/hr input				
MS2E2	MS3S2	Paint spray booth		19092-1-2005			
Process MI	Process MISC-3: Abrasive Blasting	ive Blasting					
MS3E1	MS3S1	Misc. abrasive blasting	1000 lb/hr input	Baghouse	MS3C1		
Process MI	SC-4: Rocket	Process MISC-4: Rocket Manufacturing					
PFE01 A-C		Extrusion press	Total plant: 180 tons/day propellant output				
PFE02 A-G		Annealing process	See above				
PFE03 A-C		Rod doweling process (Dowel Rod Bldg.)	See above				
PFE04		Propellant sawing (Sawing Bldg.)	See above				
PFE05		Inhibitor gluing	See above				

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Sta	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
-		Spiral Wrap MARK90 pack out	See above				
-		TOW launch pinning	See above				
-	PFS9A			Wet scrubber	PFC9A	PM	
	PFS9B	Ethyl cellulose processing	See above	Dust collector (airvey)	PFC9B	PM	
	PFS9C			Dust collector (mixer)	PFC9C	PM	
B	Process MISC-5 (WW):	Water and Wastewater Treatment					
WWFE01 A-B	WWFS1 A-B	Lime silo/two (2) slaker units – Building 409 (Filtered Water Plant)	50,000 lbs/hr	Cyclone scrubbers	WWFC1 A-B	PM	
WWFE01 C	WWFSIC	One alum silo/slaker unit – Building 409 (filtered water plant)	30,000 lbs/hr	Bag filter	WWFC1C	PM	
WWAE01	WWAS1 A-C	Lime silo/three (3) slaker units – Building 420-1 (A/B Waste Acid)	30,000 lbs/hr	Cyclone scrubbers	WWACI	PM	
WWAE02 A-B	WWAS2 A-B	Two (2) lime silo/slaker units – Building 420-2 (C line Waste Acid)	8000 lbs/hr	Cyclone scrubbers	WWAC2	PM	
WWBE01	WWBS1 A-B	Two (2) biological equalization tanks	2.6 mgd wastewater throughput	Fixed roof	WWBC1	VOCs	4/09/93
WWBE02	WWBS2	Lime silo/slaker	30,000 lb/hr	Bag filter	WWBC2	PM	
K	Process MISC-6 (SR): S.	Solvent Recovery					
	See SBE01	Ether still house	20 tons/day solvent input	Activated carbon vapor recovery	SBCIC	VOCs	
	See SBE01 C	Alcohol rectification house	20 tons/day solvent input	Activated carbon vapor recovery	SBCIC	VOCs	
Ĭ	Process MISC-7: On-Site Landfills	te Landfills					
		Three (3) on-site landfills	576,000 cu. meters volume			**	

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Emission			Size/Rated	Pollution Control		Pollitant	Applicable Permit
Unit ID	Stack ID	Emission Unit Description	Capacity	Device (PCD) Description	PCD ID	Controlled	Date
_	Process MISC-8 (OB): Open Burning	Den Burning					
OBE01	OBS1	Air curtain destructor	1 x 10 ⁶ lb/month contaminated	Ŧ			
			waste input				
			3.5 x 10 ⁶				
OBE02		Contaminated scrap burn area	lb/month				
			contaminated material input			-11	
OBE03		16 open burning pans (off-spec	8000 lb/day off-				
		propellant reduction)	input				
Process MI	Process MISC-9 (RP): Rolled Powder	olled Powder					
RPE-01	RPS1	Blender Building	Total plant: 180 tons/day rolled	Wet scrubber	RPC1	VOC, PM	
			powder output				
RPE-02 A-D	RPS2 A-D	Carpet Roll Buildings	See above				
RPE-03 A-D	RPS3 A-D	Evenspeed pads	See above				
RPE-04 A-B	RPS4 A-B	Rolled powder slitters (2)	See above				
RPE-05	RPS5	Cold block press (Rocket Area)	See above				
RPE-06 A-B	RPS6 A-B	Pack Out (2-Rocket Area)	See above				
RPE-07		Breaker Roll operation	See above				
Process MI	Process MISC-10 (NS):	Nitric and Sulfuric Acid Concentrators	tors				
NSE02 A	NSS2A	Nitric acid concentration	166 tons/day	NOx incinerator	NSC2A	NOx	
NSE02 B	NSS2B	Sulfuric acid concentration	430 tons/day, typ.				
NSE03 A	NSS3A	Nitric acid concentration	166 tons/day	NOx incinerator	NSC2A	NOx	
NSE03 B	NSS3B	Sulfuric acid concentration	430 tons/day, typ.				

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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Process MI	SC-11: Decon	Process MISC-11: Decontamination Oven				٠	
		-	Chamber				
DOE1	DOS1	Decontamination oven	capacity 1100 cubic feet				
Process MI	SC-12: Vibra	Process MISC-12: Vibratory Conveyors					
MS12E1		28 vibratory conveyors					
Process MI	SC-13: Misce	Process MISC-13: Miscellaneous Storage/Process Tanks					
See Annend	ix C of applica	See Annendix C of application, incl. supplemental submittal dated 9-11-03	ed 9-11-03				
Process RC	RA RCRA	Process RCRA: RCRA Hazardous Waste Incinerators	70.00				
RCRA01	RCRASI	RCRA hazardous waste incinerator	750 lbs/hr waste burned; 43 x 10 ⁶ BTU/hr	Evaporative cooler, baghouse, and cooler/wet scrubber (fixed-throat venturi)	RCRAC1	PM, VOC	
RCRA02	RCRASI	RCRA hazardous waste incinerator	750 lbs/hr waste burned; 43×10^6 BTU/hr	Evaporative cooler, baghouse, and cooler/wet scrubber (fixed-throat venturi)	RCRAC2	PM, VOC	-
RCRA03	RCRAS3 A-C	Incinerator Grinder Building	See above				
Process Lk	Process LR: Loading Racks	acks					
GASE01	GASS1	Truck loading at gas station	100 gal/min				
DBPE01	DBPS1	I dibutyl phthalate rail offloading	50,000 lb/hr				
EtOHE01	EtOHS1	Ethanol rail offloading	10,000 gal/hr	Activated carbon	SRC1	VOCs	
ETHE01	ETHS1	Ether rail offloading	12,000 gal/hr	Activated carbon	SRCI	VOCs	
			6000 gal/hr				
DNE06		Three 2,4-dinitrotoluene loading	throughput total				•
A -C		racks	(among all three loading racks)				
_							

*The size/rated capacity is provided for informational purposes only, and is not an applicable requirement.

NOTE: Many of the above-listed process units have no applicable permit date since they were constructed prior to March 1972.

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III. Fuel Burning Equipment Requirements – Boilers PH1 through PH5; **Boilers WB1 and WB2**

A. Limitations

- 1. Particulate emissions from each Boiler PH1 through PH5 shall be controlled by an electrostatic precipitator or equivalent control. Each pollution control device shall be provided with adequate access for inspection. (9 VAC 5-80-110)
- 2. The current fuels for Boilers PH1 through PH5 are coal and distillate oil. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the American Society for Testing and Materials, ASTM D396-78 "Standard Specification for Fuel Oils." A change in the fuels may require a permit to modify and operate. (9 VAC 5-80-110)
- 3. The current fuel for Boilers WB1 and WB2 is waste oil. A change in the fuel may require a permit to modify and operate. (9 VAC 5-80-110)
- 4. Emissions from the operation of the boilers shall not exceed the limits specified below:

Total Suspended

0.1794 lbs/million BTU input

Particulate

PM-10 0.1794 lbs/million BTU input

Sulfur Dioxide 2.64 lbs/million BTU input hourly emission limit

(9 VAC 5-80-110, 9 VAC 5-40-900 A 1 and 9 VAC 5-40-930 A)

5. Visible emissions from each of the boiler stacks shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity. (9 VAC 5-40-80, 9 VAC 5-40-940 and 9 VAC 5-80-110)

6. Boiler emissions shall be controlled by proper operation and maintenance. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum. (9 VAC 5-80-110)

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B. Monitoring

- 1. Operation & Maintenance Procedures The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the boilers and related air pollution control equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance for the boilers and related air pollution control equipment.
 - b. Maintain records of ESP operating conditions and electrical power levels for each ESP, or equivalent records as arranged with the Director, West Central Regional Office.
 - c. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the boilers and related air pollution control equipment, and maintain records of inspection results. Monthly inspection requirements are limited to those boilers which have been in service during the past month.
 - d. Have available written operating procedures for the boilers and related air pollution control equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum, if such recommendations exist.
 - e. Train operators in the proper operation of the boilers and related air pollution control equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110 and 9 VAC 5-40-20E)

C. Recordkeeping

- 1. The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:
 - a. The name of the fuel supplier,
 - b. The date on which the oil was received,
 - c. The volume of distillate oil delivered in the shipment,
 - d. A statement that the oil complies with the American Society for Testing and Materials specifications for fuel oil numbers 1 and 2, and

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e. The maximum sulfur content of the oil.

(9 VAC 5-80-110)

- 2. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:
 - a. The monthly and annual throughput of coal (in tons) and of distillate oil (in 1000 gallons) for the boilers. The annual throughput shall be calculated monthly as the sum of each consecutive twelve (12) month period.
 - b. The sulfur (lb/mmBTU), ash (%), and heat content (BTU/lb) of the coal combusted in the boilers.
 - c. The sulfur content of the oil burned in the boilers.
 - d. All fuel supplier certifications or alternative statements.
 - e. Records of ESP operating conditions and electrical power levels for each ESP, or equivalent records as arranged with the Director, West Central Regional Office.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (9 VAC 5-80-110 and 9 VAC 5-40-50)

3. The permittee shall maintain records of the required training including a statement of time, place and nature of the training provided. The permittee shall have available good written operating procedures and a maintenance schedule for the boilers. These procedures shall be based on the manufacturer's recommendations, at minimum. All records required by this condition shall be kept on site and made available for inspection by the DEQ. (9 VAC 5-80-110)

D. Testing

- Upon request from the Department, test ports shall be provided at the appropriate locations.
 (9 VAC 5-40-30 and 9 VAC 5-80-110)
- 2. Once per permit term, performance tests (stack tests) shall be conducted for particulate emissions and for sulfur dioxide emissions from the Power House (the installation consists of Boilers PH1 through PH5 with a single, common stack) to determine compliance with the emission limits in this permit. The tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-40-30. The details

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of the tests are to be arranged with the Director, West Central Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. One copy of the test results shall be submitted to the West Central Regional Office within 45 days after test completion and shall conform to the DEQ test report format.

At the option of the permittee, these stack tests may be delayed, even indefinitely, with notification to DEQ and adequate recordkeeping, until the coal throughput in BTUs for any of the boilers exceeds 50% of its annual capacity factor, calculated monthly as the sum of each consecutive twelve (12) month period. (Optional stack testing trigger = 50% x 210 million BTU capacity x 8760 hrs/yr = 919,800 million BTU/yr fuel throughput.) The delayed tests shall be performed on the Power House within 180 days should any of the five boilers comprising the Power House installation exceed the 50% annual throughput trigger. (9 VAC 5-80-110)

3. If compliance testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method – The test method is subject to DEQ approval at the time of the test (except EPA Method 9 of 40 CFR Part 60, Appendix A)
Various pollutants	Method subject to DEQ approval at the time of testing
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

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IV. Process Equipment Requirements - NA: Nitric Acid Plant

A. Limitations

Emissions of nitrogen oxides from the nitric acid production unit shall not exceed 5.5 pounds per ton of 100% acid produced. (9 VAC 5-80-110 and 9 VAC 5-40-3140)

B. Recordkeeping

The permittee shall maintain records of production rate and hours of operation for the nitric acid production unit. (9 VAC 5-80-110 and 9 VAC 5-40-3220)

C. Testing

- Upon request from the Department, test ports shall be provided at the appropriate locations.
 (9 VAC 5-40-30 and 9 VAC 5-80-110)
- 2. If compliance testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method – The test method is subject to DEQ approval at the time of the test (except EPA Method 9 of 40 CFR Part 60, Appendix A)	
Various pollutants	Method subject to DEQ approval at the time of testing	
Visible Emission	Visible Emission EPA Method 9	

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(9 VAC 5-80-110)

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V. Process Equipment Requirements – DN: DNT Production and TN: TNT Production

A. Limitations

When producing DNT, the permittee shall comply with general standards and emissions standards in accordance with 40 CFR 63, Subparts F, G and H. (9 VAC 5-80-110 and 9 VAC 5-60-100)

B. Monitoring

When producing DNT, the permittee shall comply with monitoring requirements in accordance with 40 CFR 63, Subparts F, G and H. (9 VAC 5-80-110 and 9 VAC 5-60-100)

C. Recordkeeping

When producing DNT, the permittee shall maintain records in accordance with 40 CFR 63, Subparts F, G and H. (9 VAC 5-80-110 and 9 VAC 5-60-100)

D. Testing

- Upon request from the Department, test ports shall be provided at the appropriate locations.
 (9 VAC 5-40-30 and 9 VAC 5-80-110)
- 2. When producing DNT, compliance testing shall be conducted in accordance with 40 CFR 63, Subparts F, G and H, using methods specified in those subparts. (9 VAC 5-80-110 and 9 VAC 5-60-100)
- 3. If compliance testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method – The test method is subject to DEQ approval at the time of the test (except EPA Method 9 of 40 CFR Part 60, Appendix A)	
Various pollutants	Method subject to DEQ approval at the time of testing	
Visible Emission	EPA Method 9	

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(9 VAC 5-80-110 and 9 VAC 5-60-100)

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E. Reporting

When producing DNT, the permittee shall comply with reporting requirements in accordance with 40 CFR 63, Subparts F, G and H. (9 VAC 5-80-110 and 9 VAC 5-60-100)

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VI. Process Equipment Requirements – MISC-5 (WW): Water and Wastewater Treatment

A. Limitations

- Volatile organic compound emissions from the two biological wastewater treatment plant equalization tanks shall be controlled by fixed roofs vented to the atmosphere. The equalization tanks shall be provided with adequate access for inspection. (9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 3 of 3/1/01 Permit)
- 2. The annual throughput of volatile organic compounds in the influent wastewater stream shall not exceed 66,469 pounds per day, calculated as a 30-day rolling average; 1,011 tons per month; and 12,130 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.

 (9 VAC 5-80-110 and Condition 5 of 3/1/01 Permit)
- 3. Emissions from the operation of the two equalization tanks shall not exceed the limits specified below:

Volatile Organic Compounds 301 lbs/day

9,166 lbs/month

55 tons/yr

Compliance with emission limits may be determined as stated in Condition numbers VI.A.2. and VI.D.2.

(9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 6 of 3/1/01 Permit)

B. Monitoring

- 1. Operation & Maintenance Procedures The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and nonscheduled maintenance.
 - b. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of the air pollution control equipment and maintain records of inspection results.
 - c. Have available written operating procedures for the air pollution control equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

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- d. Train operators in the proper operation of all air pollution control equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
- e. Maintain an inventory of spare parts that are needed to maintain the air pollution control equipment in proper working order.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110, 9 VAC 5-40-20E and 9 VAC 5-50-20E)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:

- a. Daily throughput of volatile organic compounds (as ether and ethanol) in the wastewater stream influent for the two biological equalization tanks;
- b. Daily ether and ethanol concentration data from analysis of either a 24-hour composite sample or grab sample from the wastewater treatment influent;
- c. Monthly volatile organic compound emissions, expressed as pounds per month;
- d. Annual volatile organic compound emissions, expressed as tons per year, calculated (by a method approved by the Board) monthly as the sum of each consecutive twelve (12) month period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 8 of 3/1/01 Permit)

D. Testing

1. Upon request from the Department, test ports shall be provided at the appropriate locations. (9 VAC 5-50-30 and 9 VAC 5-80-110)

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2. The permittee shall conduct daily sampling by collection of a 24-hour composite sample or grab sample from the wastewater treatment influent. The permittee shall also conduct analyses for the daily concentrations of ether and ethanol in the wastewater stream which contribute the majority of volatile organic compound emissions from the operation of the Biological Equalization Tanks. The compounds shall be analyzed by gas chromotography or other method as approved by the Board in order to demonstrate compliance with the emission limits contained in Condition VI.A.3 of this permit. The details of any variations to analysis by gas chromotography shall be arranged with the Director, West Central Regional Office. Additional sampling or analysis may be required by the permittee upon request by the DEQ.

(9 VAC 5-50-30G and Condition 7 of 3/1/01 permit)

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VII. Process Equipment Requirements – NC: Nitrocellulose Production

A. Limitations

- Stack NCS1 for the nitrocellulose B-line (acid storage tank and continuous nitrators) shall be a minimum of 60 feet in height.
 (9 VAC 5-80-110 and Condition 4 of 6/28/88 Permit)
- NOx emissions from the nitrocellulose C-line shall be controlled by a tray scrubber/absorber and selective catalytic reduction (SCR). The scrubber and SCR unit shall be provided with adequate access for inspection and shall be in operation when the nitrocellulose nitration (production) lines are operating.
 (9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 3 of 9/10/03 Permit)
- 3. In the event of SCR unit malfunction, the nitrocellulose nitration (production) lines shall be shut down immediately. Residual NOx emissions from the storage tanks shall be controlled by a horizontal piccolo scrubber. The scrubber shall be provided with adequate access for inspection.
 (9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 4 of 9/10/03 Permit)
- 4. The temperature of the fired heater acid gas outlet preceding the SCR catalyst column shall be maintained between 500 deg F and 650 deg F during operation. (9 VAC 5-80-110, 9 VAC 5-50-260 and Condition 5 of 9/10/03 Permit)
- The throughput of nitrocellulose through the C-line nitrators shall not exceed 25,400 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
 (9 VAC 5-80-110 and Condition 11 of 9/10/03 Permit)
- Visible emissions from the SCR exhaust shall not exceed 10 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
 VAC 5-50-80, 9 VAC 5-80-110, 9 VAC 5-50-290 and Condition 13 of 9/10/03 Permit)
- Visible emissions from the piccolo scrubber exhaust shall not exceed 10 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
 (9 VAC 5-50-80, 9 VAC 5-80-110, 9 VAC 5-50-290 and Condition 14 of 9/10/03 Permit)
- 8. Emissions from the operation of the nitrocellulose C-line shall not exceed the limits specified below:

Sulfur Dioxide

92 ppmv

4.0 lbs/hr

17.5 tons/yr

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Nitrogen Oxides (as NO and NO2.

125 ppmv, as an hourly avg. 2.8 lbs/hr

12.3 tons/yr

combined)

(9 VAC 5-80-110 and Condition 12 of 9/10/03 Permit)

B. Monitoring

- 1. The SCR exhaust shall be equipped with a continuous emissions monitor to measure and record the concentration of NOx. The monitor shall be maintained, located, and calibrated in accordance with approved procedures (ref. 40 CFR 60.13 and 40 CFR 60 Appendix B). Cylinder gas audits (CGA) shall be conducted each quarter in accordance with 40 CFR 60, Appendix F, paragraph 5, "Data Accuracy Assessment". Provided that the quarterly results of the CGA meet the criteria for data accuracy, as specified in 40 CFR 60 Appendix F, an annual relative accuracy test audit (RATA) will not be required. A thirty (30) day notification, prior to the demonstration of continuous monitoring system's performance, and subsequent notifications shall be submitted to the Director, West Central Regional Office. (9 VAC 5-80-110, 9 VAC 5-50-20 C, 9 VAC 5-50-260 and Condition 6 of 9/10/03 Permit)
- 2. The fired heater acid gas outlet shall be equipped with a temperature sensor and automatic thermostat to maintain the temperature within the range specified in Condition VII.A.4, above. The monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the SCR unit is operating. (9 VAC 5-80-110, 9 VAC 5-50-20 C, 9 VAC 5-50-260 and Condition 7 of 9/10/03 Permit)
- 3. The tray scrubber shall be equipped with devices to continuously measure the scrubber liquid flow rate and the differential pressure drop across the scrubber. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the scrubber is operating. (9 VAC 5-80-110, 9 VAC 5-50-20 C, 9 VAC 5-50-260 and Condition 8 of 9/10/03 Permit)
- 4. The piccolo scrubber shall be equipped with a device to continuously measure the scrubber liquid flow rate. The monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include,

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as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the scrubber is operating.

(9 VAC 5-80-110, 9 VAC 5-50-20 C, 9 VAC 5-50-260 and Condition 9 of 9/10/03 Permit)

- 5. The fired heater acid gas outlet automatic thermostat and the flow meters used to continuously measure tray and piccolo scrubber liquid flow rate shall be observed by the permittee with a frequency sufficient to ensure good performance of the thermostat and the flow meters.
 (9 VAC 5-50-50 H and Condition 10 of 9/10/03 Permit)
- 6. Operation & Maintenance Procedures The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of the air pollution control equipment and maintain records of inspection results.
 - c. Have available written operating procedures for the air pollution control equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all air pollution control equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
 - e. Maintain an inventory of spare parts that are needed to maintain the air pollution control equipment in proper working order.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110, 9 VAC 5-40-20E and 9 VAC 5-50-20E)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such

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records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:

- 1. Annual throughput of nitrocellulose through the C-line nitrators, calculated monthly as the sum of each consecutive twelve (12) month period.
- 2. The fired heater acid gas outlet temperature.
- 3. Cylinder gas audits conducted on the NOx continuous emissions monitor for the SCR exhaust.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 15 of 9/10/03 Permit)

D. Testing

- Upon request from the Department, test ports shall be provided at the appropriate locations.
 (9 VAC 5-50-30 and 9 VAC 5-80-110)
- If compliance testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method – The test method is subject to DEQ approval at the time of the test (except EPA Method 9 of 40 CFR Part 60, Appendix A)
Various pollutants	Method subject to DEQ approval at the time of testing
Visible Emission	EPA Method 9

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(9 VAC 5-80-110)

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VIII. Process Equipment Requirements – RCRA Hazardous Waste Incinerators

A. Limitations

1. In accordance with 40 CFR 63, Subpart EEE, Section 63.1203(a), the permittee shall not discharge or cause combustion gases to be emitted into the atmosphere that contain emissions in excess of the following:

Dioxins and furans

0.40 ng TEQ/dscm corrected to 7 percent oxygen

Mercury

130 µg/dscm corrected to 7 percent oxygen

Combined lead and cadmium

240 µg/dscm corrected to 7 percent oxygen

Combined arsenic, beryllium and chromium

97 µg/dscm corrected to 7 percent oxygen

EITHER of the following two options:

a) Carbon monoxide: 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen. If you elect to comply with this carbon monoxide standard rather than the hydrocarbon standard in Section 63.1203(a)(5)(ii), you must also document that, during the destruction and removal efficiency (DRE) test runs or their equivalent as provided by Sec. 63.1206(b)(7), hydrocarbons do not exceed 10 parts per million by volume during those runs, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane; OR

b) Hydrocarbons: 10 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane

Combined hydrochloric acid and chlorine gas

77 parts per million by volume, expressed as hydrochloric acid equivalents, dry basis and

corrected to 7 percent oxygen

Particulate matter

34 mg/dscm corrected to 7 percent oxygen

(9 VAC 5-80-110 and 9 VAC 5-60-100)

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B. Monitoring

- 1. The permittee shall comply with the operating requirements and operating parameter limits specified in the September 29, 2003 or most current Documentation of Compliance prepared pursuant to 40 CFR 63, Subpart EEE, Section 63.1211; with the operating requirements and operating parameter limits specified in the Notification of Compliance prepared pursuant to 40 CFR 63, Subpart EEE, Section 63.1210; and with monitoring requirements in accordance with 40 CFR 63, Subpart EEE, Section 63.1209.
 - (9 VAC 5-80-110 and 9 VAC 5-60-100)
- 2. Operation & Maintenance Procedures The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and nonscheduled maintenance.
 - b. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of the air pollution control equipment and maintain records of inspection results.
 - c. Have available written operating procedures for the air pollution control equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all air pollution control equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
 - e. Maintain an inventory of spare parts that are needed to maintain the air pollution control equipment in proper working order.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110 and 9 VAC 5-40-20E)

C. Recordkeeping

The permittee shall maintain records in accordance with 40 CFR 63, Subpart EEE, Section 63.1211. (9 VAC 5-80-110 and 9 VAC 5-60-100)

D. Testing

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- Upon request from the Department, test ports shall be provided at the appropriate locations.
 (9 VAC 5-40-30 and 9 VAC 5-80-110)
- Compliance testing shall be conducted in accordance with 40 CFR 63, Subpart EEE, Section 63.1207, using methods specified in Section 63.1208.
 (9 VAC 5-80-110 and 9 VAC 5-60-100)

E. Reporting

The permittee shall comply with reporting requirements in accordance with 40 CFR 63, Subpart EEE, Section 63.1211. (9 VAC 5-80-110 and 9 VAC 5-60-100)

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IX. Facility Wide Conditions

A. Limitations

- RFAAP shall comply with all applicable current and future MACT, NESHAPS, NSPS and state regulations for fossil fuel fired boilers, internal combustion engines, miscellaneous organic chemical manufacturing, commercial and industrial solid waste incinerators, organic liquid distribution, military MACTs and any other applicable regulations once promulgated. (9 VAC 5-80-110)
- 2. The automated multi-base propellant manufacturing (CAMBL) facility is not operating and shall not be operated. Consequently, the permit dated April 2, 1984 is invalid. Reactivation of this facility may require a permit. (9 VAC 5-80-110)
- 3. The TNT red water sellite recovery facility is not operating and shall not be operated. Consequently, the permit dated June 7, 1985 is invalid. Reactivation of this facility may require a permit. (9 VAC 5-80-110)
- 4. The two package boilers permitted on September 6, 1984 are not operating and shall not be operated. Consequently, the permit dated September 6, 1984 is invalid. Reactivation of these units may require a permit. (9 VAC 5-80-110)
- 5. Hourly particulate emissions from any process unit, except as specified in sections titled "Fuel Burning Equipment Requirements" and "Process Equipment Requirements" in this permit, shall not exceed the maximum allowable emission rate for the applicable process weight rate, as shown in Table 4-4A in 9 VAC 5-40-260 A. Except as provided in 9 VAC 5-40-260 C and D (regarding interpolation and extrapolation of data), interpretation of the emission rate shall be in accordance with 9 VAC 5-40-22.
 (9 VAC 5-40-22, 9 VAC 5-40-260 and 9 VAC 5-80-110)
- 6. Sulfur dioxide emissions from any noncombustion process operation, except as specified in sections titled "Fuel Burning Equipment Requirements" and "Process Equipment Requirements" in this permit, shall not exceed an in-stack concentration of 2000 ppm by volume.

 (9 VAC 5-40-280 and 9 VAC 5-80-110)
- 7. Visible emissions from the facility, except as specified in sections titled "Fuel Burning Equipment Requirements" and "Process Equipment Requirements" in this permit, shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity. (9 VAC 5-40-80 and 9 VAC 5-80-110)

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B. Monitoring

1. Visible Emissions: Each emissions unit with a visible emissions requirement in the sections titled "Fuel Burning Equipment Requirements" and "Process Equipment Requirements" in this permit, as well as other emissions units as arranged with the Director, West Central Regional Office, shall be observed visually at least once each calendar week in which the emissions unit operates. If visible emissions observations conducted for a particular stack during twelve (12) consecutive weeks show no visible emissions, the permittee may, with DEQ concurrence, reduce the monitoring frequency to once per month for that particular stack. Any time the monthly visible emissions observations show visible emissions, or when requested by the DEQ, the monitoring frequency shall be increased to once each calendar week. The visual observations shall be conducted using 40 CFR 60 Appendix A Method 22 techniques (condensed water vapor/steam is not a visible emission) for at least a brief time to only identify the presence of visible emissions, unless the unit is monitored by a 40 CFR 60 Appendix A continuous opacity monitor. Each emissions unit in the Method 22 technique observation having visible emissions shall be evaluated by conducting a 40 CFR 60 Appendix A Method 9 visible emissions evaluation (VEE) for at least six (6) minutes, unless corrective action is taken that achieves no visible emissions. 40 CFR 60 Appendix A Method 9 requires the observer to have a Method 9 certification that is current at the time of the VEE. If any of these six (6) minute VEE averages exceed the unit's opacity limitation, a VEE shall be conducted on these emissions for at least 3 six minute periods (at least 18 minutes). All visible emission observations, VEE results, and corrective actions taken shall be recorded. (9 VAC 5-80-110E)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and 9 VAC 5-40-50)

D. Testing

1. Upon request from the Department, test ports shall be provided at the appropriate locations.

(9 VAC 5-40-30 and 9 VAC 5-80-110)

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2. If compliance testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method – The test method is subject to DEQ approval at the time of the test (except EPA Method 9 of 40 CFR Part 60, Appendix A)
Various pollutants	Method subject to DEQ approval at the time of testing
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

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X. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5- 80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
•	Trial runs done for research and development purposes	9 VAC 5-80-720A		
-	Diesel fueling station	9 VAC 5-80-720A		
-	Air-conditioning and ventilation units used for human comfort	9 VAC 5-80-720A		
-	Office equipment, including printers and copiers	9 VAC 5-80-720A		
-	Janitorial services	9 VAC 5-80-720A		
-	Internal combustion engines used for landscaping	9 VAC 5-80-720A		
-	Emergency electrical generators	9 VAC 5-80-720A		
-	Equipment used for quality control/ assurance	9 VAC 5-80-720A		
3-	Bench-scale laboratory equipment	9 VAC 5-80-720A		
	Ozone generators	9 VAC 5-80-720A		
*	Fire suppression systems	9 VAC 5-80-720A		
-	Steam vents and safety relief valves	9 VAC 5-80-720A		
n i	Laundry activities	9 VAC 5-80-720A		
	Acid storage tanks			
*	and any storage tanks which will not emit any VOC or HAP (see also Appendix C of application)	9 VAC 5-80-720A		
π.	Plant maintenance and upkeep	9 VAC 5-80-720A	1	

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Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5- 80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
9 .	Process water filtration systems	9 VAC 5-80-720A		
·	Boiler water treatment operations	9 VAC 5-80-720A		0
	5 firing ranges (3 indoor, 2 outdoor)	9 VAC 5-80-720B	Particulate	8
-	Power House salt silo (used for softening boiler feed water)	9 VAC 5-80-720B	Particulate	
G5001-G6304	26 emergency generators (diesel and gasoline powered)	9 VAC 5-80-720C		All gasoline generators < 911 hp; all diesel generators < 6667 hp; all generators operate < 500 hrs/yr

These insignificant emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

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XI. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability	
None identified			
10			

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law. (9 VAC 5-80-140)

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XII. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

- 1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- 2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
- 3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
- 4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- 5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C & F, 9 VAC 5-80-110 D & 9 VAC 5-80-170 B)

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C. Recordkeeping and Reporting

- 1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

- 2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original data records and logs for continuous monitoring instrumentation, and copies of all reports required by the permit.
 (9 VAC 5-80-110 F)
- 3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G. (Note that much of the recordkeeping required by this permit also serves as required periodic monitoring to determine emissions compliance and therefore needs to be addressed in the periodic reports.) The details of the reports are to be arranged with the Director, West Central Regional Office. The reports shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

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- (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

The report shall be sent to the following address:

Director, West Central Regional Office ATTN: Air Compliance Manager Virginia DEQ 3019 Peters Creek Road Roanoke, VA 24019

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and to DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. The identification of each term or condition of the permit that is the basis of the certification.
- 3. The compliance status.
- 4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- 5. The identification of each term or condition of the permit that is the basis of the certification.
- 6. The compliance status.
- 7. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

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- 8. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- 9. Such other facts as the permit may require to determine the compliance status of the source.

This annual compliance certification shall be sent to the following addresses:

Director, West Central Regional Office ATTN: Air Compliance Manager Virginia DEQ 3019 Peters Creek Road Roanoke, VA 24019

Clean Air Act Title V Compliance Certification (3AP00) U. S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, West Central Regional Office, within four (4) daytime business hours of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition XII.C.3. of this permit.

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after a deviation is discovered from permit requirements, notify the Director, West Central Regional Office, by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the

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written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, West Central Regional Office.

FOIA EXEMPT

- 1. The emission units that have continuous monitors subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not subject to the two week written notification.
- 2. The emission units subject to the reporting and the procedure requirements of 9 VAC 5-40-50 C and the procedures of 9 VAC 5-50-50 C are listed below:
 - a. Nitrocellulose C line SCR exhaust: Continous emission monitor to measure and record the concentration of NOx, located at the SCR exhaust
 - b. RCRA hazardous waste incinerators: Continuous emission monitors to measure and record the concentration of CO and O₂, leak detection monitors to identify potential bag leaks
- 3. Each owner required to install a continuous monitoring system subject to 9 VAC 5-40-41 or 9 VAC 5-50-410 shall submit a written report of excess emissions (as defined in the applicable emission standard) to the board for every calendar quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter and shall include the following information:
 - a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h) or 9 VAC 5-40-41 B 6, any conversion factors used, and the date and time of commencement and completion of each period of excess emissions;
 - Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the source. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted;
 - c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments; and
 - d. When no excess emissions have occurred or the continuous monitoring systems have not been inoperative, repaired or adjusted, such information shall be stated in the report.
- 4. All malfunctions of emission units not subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C require written reports within two weeks of the discovery of the malfunction.

(9 VAC 5-20-180 C, 9 VAC 5-50-50 and 9 VAC 5-80-250)

G. Startup, Shutdown, and Malfunction

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At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20, 9 VAC 5-40-20)

H. Malfunction as an Affirmative Defense

- 1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that'show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. The notice fulfills the requirement of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.
- 3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
- 4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

I. Fugitive Dust Emission Standards

Radford, Virginia

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During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

- 1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- 2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
- 4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- 5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

J. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

K. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

L. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the

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conditions of this permit. (9 VAC 5-80-110 G.3)

M. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)

N. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

O. Duty to Submit Information

- The permittee shall furnish to the Board, within a reasonable time, any information
 that the Board may request in writing to determine whether cause exists for
 modifying, revoking and reissuing, or terminating the permit or to determine
 compliance with the permit. Upon request, the permittee shall also furnish to the
 Board copies of records required to be kept by the permit and, for information
 claimed to be confidential, the permittee shall furnish such records to the Board along
 with a claim of confidentiality.
 (9 VAC 5-80-110 G.6)
- Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

P. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

Q. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described

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in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

FOIA EXEMPT

R. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

S. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

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(9 VAC 5-80-110 L)

T. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

U. Transfer of Permits

- No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another. (9 VAC 5-80-160)
- 2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)
- 3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations. (9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

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X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F. (40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150). (9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)